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July 31, 2020

Honorable John G. Koeltl
United States District Judge
United States District Court
Southern District of New York
Daniel Patrick Moynihan
United States Courthouse
500 Pearl Street
New York, New York 1007-1312
VIA ECF

Application granted. SO ORDERED. New York, NY <u>/s/ John G. Koeltl</u> July 31, 2020 John G. Koeltl, U.S.D.J.

Re: Ventura et. al v. Putnam Gardens Parking Corp. et. al
Civil Action No. 1:20-cv-000119

Dear Judge Koeltl:

My office represents the Plaintiff in this action. Your Honor entered an Order (DE 19) requiring an Order to Show Cause for Default Judgment against the defendant corporation be filed by August 14, 2020.

I am writing to request an extension of time, to September 30, 2020, to file the Order to Show Cause.

I was out of state beginning June 25 for approximately four weeks for my father's final illness and the arrangements after his death. During my absence, my office had to adjourn my entire calendar, and request extensions of deadlines. As a result, when I returned to the office, I returned to a full calendar of court conferences and imminent deadlines to work on. In addition to my workload, consistent with Korean custom and tradition, as the only son, I have responsibilities to my mother to handle all matters that are the aftermath of my father's death. I have been working 14 to 16 hours a day, including weekends, to manage my personal and professional responsibilities.

I recognize the requested extension is a lengthy one. In determining the length of extension to request, I carefully weighed my responsibility to my client to expeditiously move his case toward conclusion, with my responsibility to both my client and the Court to prepare thorough and complete pleadings for the Order to Show Cause, and to ensure that I carefully review my client's claims and proofs to ensure that all of his damages claims are presented.

For these reasons, I respectfully request an extension of time to September 30, 2020 to file the Order to Show Cause.

Thank you for your consideration of my request.

Respectfully submitted.

s/ Michael K. Chong

Michael K. Chong